

Memo

To: General Plan Update Steering Committee
From: Neal Toft, Planning & Building Director
Date: 8/24/2020
Re: Review of Circulation Element; Goals 3 and 4: General Plan Update Steering Committee Study Session on August 24, 2020.

In our previous meeting on August 17, staff provided a summary of the prior workshops on the Draft Circulation Element and Economic Resilience, which informed much of the edits that were made to the current draft version. Staff also presented the revised Draft Introduction to the Circulation Element, which provided much more framework for the policies and goals. In this exercise, staff and the GPUSC will continue review of the “track-changes version” of the draft goals, policies, and programs, that was initiated last week. Many of these changes are self-explanatory or are otherwise clarified with comment bubbles.

Goal Statements 3 and 4 contain several policies that bear clarification, discussion, and feedback:

Vehicle Miles Travelled (VMT)

Background

VMT is a performance measure that relates motor vehicle trip mobility to the performance of traffic facilities within a predefined location. While VMT only includes vehicle trip counts, the metric inherently accounts for the benefits of transit and active transportation trips that reduce motor vehicle travel.

Consideration of VMT as a threshold for traffic impact studies as an alternative to LOS is required by California State law (Senate Bill 743) effective July 2020. In response to SB 743 the State’s Office of Planning and Research (OPR) updated the existing methods for evaluating transportation impacts under the California Environmental Quality Act (CEQA). OPR established a Vehicle-Miles-Travelled (VMT) metric to assess traffic impacts instead of the prevailing LOS standard. However, although auto delay must no longer be considered a significant impact under CEQA, SB 743 does not prevent local jurisdictions from establishing locally appropriate metrics as a standard outside of the CEQA process. However, the impact upon VMT must be assessed in conjunction with both the adoption of this General Plan and for development projects that meet certain threshold criteria.

The use of VMT as a performance measure allows for the evaluation of traffic impacts associated with greenhouse gas emissions. It can be measured as a total or on a per-capita basis and can be used to estimate fuel consumption by motor vehicles for distances traveled. Increase in VMT for

gasoline-powered vehicles would cause an increase in the GHG emissions from vehicles making these trips.

Travel Forecasting Models

Guidance from OPR states that using a travel forecasting model is preferred because a travel model would account for both 'project generated VMT' and the 'project effect on VMT', which would include the effect of the project on operating speeds that would further influence VMT. TAM developed the Transportation Authority of Marin Demand Model (TAMDM), a tour-based assessment of travel behavior that produces VMT estimates for cities through Marin County, including Larkspur. While both Caltrans and MTC have also produced VMT estimates for the greater region, these regional models may not contain a level of accuracy and sensitivity for local area applications and should include a sub-area validation process, to calibrate and validate the model within the study area. This process was conducted for Marin County as part of the TAMDM development process.

The TAMDM presents VMT as per resident, per worker and per service population.

- VMT per resident includes all home-based trips which include discretionary trips, eating out, maintenance, school, shopping, university and visiting trip types. This VMT type would not include work-based trips such as going out to lunch or running an errand where work location is the origin of the trip.
- VMT per worker includes all work-related trip purposes including home-base work, and work based but not other home-based trip types.
- VMT per service population better measures the full VMT effects of the general plan by including all vehicle trip types, including trips taken by residents, people employed in Larkspur Larkspur, students and visitors.

Significance Thresholds for VMT

The significance threshold defines what constitutes an acceptable level of VMT and what requires mitigation measures to reduce VMT. Thresholds should be consistent with key transportation planning documents such as Plan Bay Area 2040, which contains regional and local projections of VMT growth associated with expected changes in population, employment, and the regional transportation network. Additional VMT reduction may be achieved at the project level through TDM strategies and active transportation network expansion which are not fully accounted for in regional level travel forecasting models.

SB743 did not authorize OPR to set thresholds for VMT, but it did direct OPR to develop guidelines for determining the significance of the transportation impacts of projects. Per CEQA Section 15064.7, lead agencies have discretion to develop and adopt their own significance thresholds or rely on thresholds recommended by other agencies "provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

At this time, the City of Larkspur has not established significance thresholds for acceptable versus unacceptable levels of VMT for CEQA analysis, and what level of significance requires mitigation measures to reduce VMT. Guidance from OPR recommends setting land use project VMT thresholds at fifteen percent below baseline VMT per capita for the region, in this case defined as Marin County. However, while this threshold is based on the maximum potential VMT reductions associated with vehicle travel reduction strategies, most travel forecasting models are not sensitive to Travel Demand Management (TDM) strategies so additional VMT reduction is possible through

proposed 2040 General Plan implementation and TDM strategies applied at the project level. For General Plans, OPR's guidance is not to quantitatively analyze the total VMT reduction to fifteen percent below baseline VMT per capita for the city. Rather, OPR's guidance includes describing what level of development the proposed 2040 General Plan foresees and how that level of development could meet the fifteen percent reduction below baseline VMT per capita for the region.

A local VMT metric must support three statutory goals:

- The reduction of greenhouse gases
- The development of multimodal transportation networks, and
- A diversity of land uses

Lead agencies should select a significance threshold that aligns with state law on all three. OPR provides recommendations to assist lead agencies in selecting a significance threshold that may be appropriate for their particular projects.

Larkspur VMT Threshold Policy

While Larkspur is in position to utilize TAMDM for adopting local thresholds based upon localized data, we recommend Larkspur develop the significance thresholds for CEQA purposes through a separate process from the General Plan Update:

- The General Plan is focused on developing broad policies and programs that assist in reducing VMT, with particular focus on the three statutory goals for the VMT metric, described above. VMT is a relatively new metric and the data and thresholds involved may be subject to further modifications and may be best addressed to as policies by resolution for the City Council.
- The threshold guidance should address project-level impacts which are not proposed in the General Plan.
- While development facilitated by the General Plan update may increase VMT within the Larkspur Planning Area, compliance with the proposed GP policies and programs should ensure that the impacts are less than significant.
- There may be a potential conflict of interest if some perceive the setting of significance thresholds as part of a General Plan Update as means to facilitate or restrict certain land use changes proposed under the GP.

Draft Policy 4.2 is provided to reflect this approach: *Policy CIR-4.2: Develop a policy for new development to achieve a minimum percentage reduction in Vehicle Miles Traveled (VMT) per capita or per service population versus countywide estimates, utilizing countywide modeling and based upon VMT reduction strategies from Quantifying Greenhouse Gas Mitigation Measures, CAPCOA, 2010, or similar professional research documents.*

Implications of having (vs not having) acceptable LOS levels for signalized and unsignalized intersections

Significance criteria are used to establish what constitutes an impact by a project. According to the CEQA Guidelines Appendix G, the proposed project would have a significant impact on transportation if it would:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- Result in inadequate emergency access.

Draft Action Programs CIR-3.2.a and 3.2.b are carried over from both the 1990 General Plan and the CAC Draft General Plan, which set Acceptable LOS at level D for signalized intersections and level C for unsignalized intersections. These are both applicable to peak traffic periods and have made exceptions for the following intersections (City Council Resolution No. 9/92):

- Sir Francis Drake Boulevard at Eliseo Drive;
- Sir Francis Drake Boulevard at La Cuesta Drive;
- Sir Francis Drake Boulevard at Bon Air Road;
- Magnolia Avenue at William Avenue;
- Magnolia Avenue at Baltimore Avenue; and
- Magnolia Avenue at Wiltshire

While Larkspur should continue to include LOS guidance, it may be appropriate to ensure that these levels more realistically reflect existing conditions, and not override the city's ability to initiate desirable land use changes as part of the General Plan process. Further, these policies have potential to restrict the ability of the city to grow and to implement multimodal 'Complete Streets' improvements.

Cities can still use vehicle LOS outside of the CEQA process. The most common applications may be for jurisdictions to size roadways in their general plans to determine nexus relationships for their impact fee programs or require installation of improvements or contribution where delay in excess of the LOS standard is expected to occur. Unacceptable operations may also result in multimodal safety implications. Thus, there is a benefit to understanding existing and projected traffic operations in the city.

However, under CEQA, it would be difficult to justify a road widening project identified as part of an LOS analysis that might come at the expense of sidewalk width, bicycle lanes or other 'Complete Streets' elements. Additionally, setting unrealistically high LOS standards (i.e., LOS C) might result in some future challenges for Larkspur, specifically:

- Setting LOS C as a standard may result in an oversizing of intersections to maximum vehicular throughput, likely resulting in higher traffic volumes, higher speeds, more roadway maintenance, and less roadway space allocated to non-vehicular modes. There is little actual land, or community interest, to create such capacity improvements.
- Under CEQA today, LOS is not considered an environmental impact. If trips associated with a future development that is otherwise in compliance with the General Plan contributed towards a worsening of LOS at an intersection, the city could collect impact fees, but would not be able to mitigate in a way that would exacerbate the environmental impacts associated with auto traffic. Rather it may be preferential to use impact fees to promote alternative transportation infrastructure, programs, and systems.
- Traffic in Larkspur is impacted by regional traffic traveling through Larkspur. The current level of service at many intersections in the city is not only a reflection of roadway supply and demand among residents in Larkspur, but also for the region. Regional traffic is greatly affected by ever-

changing economic conditions, demographics, and transit alternatives. Thus, the city might end up restricting otherwise desirable land use changes because of conditions outside of the city's control, which may ultimately be addressed by other outside factors. Further, it is the goal of regional plans to enhance regional transit options and reduce VMT, potentially reducing local impacts in Larkspur.

Staff has written language under Policy CIR-3.2 to provide a more qualified approach to how the LOS limits are applied for projects. However, it bears discussion as to whether these should be further reconsidered, particularly relative to the differences between peak and non-peak conditions.

Thresholds for Requiring Traffic Studies

It is important that the City identify thresholds for traffic studies to ensure an appropriate 'fit' for the development that may be expected because of the General Plan update. However, as we have discussed, the current policies and standards require some level of traffic study for virtually any expansion of a use or change in use that has the potential to add one or more peak hour trips, as defined by ITE manual. The CAC and the GPUSC have both concurred that the current traffic policies should be reserved for more significant projects so that the vitality and evolution of commercial areas, particularly existing commercial development, can be encouraged rather than obstructed.

The draft language provided has not specifically identified the threshold for how and when traffic analysis, particularly for trip generation and LOS, should be applied. Given this, traffic studies are valuable for cities in that they help to:

- Understand impacts of developments to local roadways
- Ensure that the development is employing TDM strategies to minimize VMT, including improving or increasing access to transit, incorporating affordable housing into the project, providing bicycle parking, and limiting parking supply.
- Provide a basis to exact appropriate improvements to the circulation system and/or fees to support planned improvements and programs.
- Establish consistency with the General Plan

Under current CEQA guidelines, lead agencies must analyze a project's transportation impacts using VMT. OPR guidance (which may or may not be adopted by Larkspur) indicates that projects that are located within ½ mile of a "major transit stop" or along a "high quality transit corridor" should be presumed to have a less than significant transportation impact. A major transit stop is a "site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." A high-quality transit corridor is "a corridor with fixed route bus service with service intervals that do not exceed 15 minutes during peak commute hours."

Thus, under current CEQA guidelines many future developments in Larkspur may not be required to submit a traffic study for VMT. The OPR Technical Advisory also provides guidance for setting screening thresholds and thresholds of significance:

- As stated by the new guideline, projects within one-half mile of a major transit stop or high-quality transit corridor should be presumed to result in a less-than-significant impact.

- Small projects that generate fewer than 110 trips per day may generally be assumed to cause a less-than-significant transportation impact.
- Agencies may develop map-based screening for residential and office projects where projects located near areas with low VMT may be presumed to have a less-than-significant transportation impact.
- Residential projects that result in per capita VMT that exceeds 85 percent of existing regional or city average VMT may indicate a significant impact.
- Office projects that result in per employee VMT that exceeds 85 percent of existing regional average VMT may indicate a significant impact.
- With retail projects, the Technical Advisory recommends that the analysis should be based on total change in VMT because retail projects usually re-route travel from other retail destinations.

In regards to assessing trip generation and LOS impacts as well as VMT, these standard thresholds for VMT may not be adequate to “fit” the needs of the community to address local impacts of development. While Larkspur could require a traffic study for projects that would generate more than 110 trips per day, (consistent with VMT guidance), is it expected that many future developments in Larkspur will be large enough to generate 110 trips per day?

Staff will seek this opportunity to discuss the size of the developments that may be initiated as a result of the existing and potential land use changes that may occur under GP update and consider options to set these thresholds appropriately.